

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

Serenity Medina,

Plaintiff,

Case No. 2:18-cv-01683-JPS

vs.

United Ground Express,

Defendant.

JOINT RULE 26(f) REPORT

The parties, Serenity Medina (“Plaintiff” or “Medina”) and Defendant United Ground Express (the “Defendant”), submit this Joint Rule 26(f) report pursuant to Local Rule 16. Pursuant to Rule 26(f), a joint meeting was held on November 21, 2018 and attended by Michael Lueder on behalf of Plaintiff and Sean Scullen on behalf of Defendant.

A. Brief Summary of Nature of Case; Preliminary Injunction

Plaintiff’s complaint alleges race discrimination and retaliation in violation of Title VII of the Civil Rights Act, 42 U.S.C. § 1981. Plaintiff was held to different standards than Caucasian employees and was discharged when she allegedly violated those standards. Plaintiff was also denied pay for all time worked in violation of the Fair Labor Standards Act and Wisconsin wage law. Defendants denies these allegations.

B. Rule 26 Information

1. **Rule 16(b) Scheduling Conference.** A Scheduling Conference is set for December 18, 2018, at 11:30.

2. **Possibility of Settlement.** During the Rule 26(f) Conference, counsel for the parties discussed the potential for early settlement and are engaged in ongoing settlement communications.

3. **Rule 26(a)(1) Disclosures.** The parties agreed to exchange their initial disclosures on December 15, 2018.

4. **Need for Protective Order.** Defendant will likely produce information it views as confidential and will seek a standard protective order regarding the production of confidential documents. The parties expect to present a proposed order to the Court within the next six weeks.

5. **Discovery Issues.** The parties do not anticipate any discovery issues.

6. **Case Schedule.**

The parties propose the following case schedule:

Event	Proposed Date
Deadline to serve Initial Disclosures	December 15, 2018
Deadlines to add additional parties and to amend pleadings without leave of Court	January 18, 2019
Close of Fact Discovery	May 31, 2019
Designation of Expert Witnesses and Exchange of Initial Expert Reports for which party bears burden	June 14, 2019
Designation of Rebuttal Experts and exchange of Rebuttal Expert Reports	July 1, 2019
Close of Expert Discovery	July 19, 2019
Deadline to file Dispositive Motions	July 31, 2019
Trial	TBD

C. Modifications to Limitation on Discovery Imposed by the Federal Rules

The parties propose no changes to the Federal Rules of Civil Procedure.

D. Privilege Issues

The parties wish the court to enter a Federal Rule of Evidence 502(d) order. If information protected from disclosure by the attorney-client privilege or work product doctrine is disclosed without intent to waive the privilege or protection, within fourteen (14) days after discovery of the inadvertent production, the producing party may amend its discovery response and notify the other party that such information was inadvertently produced and should have been withheld. Once the producing party provides such notice, the recipient must promptly return the specified information with any copies. The recipient cannot assert that the production waived the privilege protection, however, the recipient does not waive the right to challenge the assertion of the privilege and seek a court order denying such privilege.

E. Electronic Service and Electronic Copies

The parties consent to service by electronic means as set forth in Federal Rule of Civil Procedure 5(b)(2)(E) and that such service shall be complete upon transmission, provided that the sender does not receive any indication that such electronic transmission was unsuccessful. Service on Plaintiff will be made to at least the following counsel:

HANSEN REYNOLDS LLC
Michael C. Lueder
316 North Milwaukee Street
Suite 200
Milwaukee, Wisconsin 53202
Email: mlueder@hansenreynolds.com

Service on Defendants will be made to at least the following counsel:

QUARLES & BRADY LLC
Sean M. Scullen
411 E. Wisconsin Ave.
Suite 2400
Milwaukee, Wisconsin 53202-4426
Email: sean.scullen@quarles.com

F. Electronic Discovery

The parties agree to discuss and seek agreement on protocols with respect to the identification, review, and production of electronically stored information. Electronically stored information shall be produced in an electronic format to be agreed upon by the parties and on a rolling basis. Each party reserves the right to request any document in color or in native format as needed and such request shall not be unreasonably denied.

Date: December 11, 2018

HANSEN REYNOLDS LLC

By: /s/ Michael C. Lueder

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